

<p>Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address</p> <p>Eloise K. Hahn, party 313 East 1300 North Chesterton, IN 46304 (219) 628-5481 eloisehahn313@gmail.com</p> <p>Steven A. Leahey, Esquire 150 N. Michigan Av Suite 1120 Chicago, IL 60601 (312)664-6649</p> <p>Attorney for: Plaintiff</p>	<p>FOR COURT USE ONLY</p> <div data-bbox="984 237 1421 527" style="text-align: center;"> <p>RICHMOND DIVISION FILED SEP 24 2020 FILED CLERK U.S. BANKRUPTCY COURT</p> </div>
<p>UNITED STATES BANKRUPTCY COURT</p>	
<p>In re: Thomas Alan Minor and Renee Scott Minor</p>	<p>CASE NO.: 10-30161-KLP ADVERSARY NO.: 20-03129-KLP CHAPTER: 7</p>
<p style="text-align: right;">Debtor(s).</p> <p>Eloise K. Hahn</p> <p style="text-align: right;">Plaintiff(s).</p> <p style="text-align: center;">vs.</p> <p>Thomas Alan Minor et.al.</p> <p style="text-align: right;">Defendant(s).</p>	<p style="text-align: center;">APPLICATION OF NON-RESIDENT ATTORNEY TO APPEAR IN A SPECIFIC CASE [LBR 2090-1(b)]</p>

- I, Steven A. Leahey, apply to the court under LBR 2090-1(b) for permission to appear and participate in the above-entitled action on behalf of the following named party, by whom I have been retained (*specify name of party*):

Eloise K. Hahn, plaintiff
- I have paid the required fee specified in LBR 2090-1(b)(5) to the United States Bankruptcy Court and have attached a copy of the receipt.

3. I am a lawyer with the following law firm (*specify name and address of law firm*):

Steven A. Leahey, Attorney @ Law

4. I am a member in good standing and eligible to practice before the following courts and admitted to practice on the following dates (*specify name of each such jurisdiction and my date of admission to practice in each such jurisdiction*):

5. I am not a resident of, nor am I regularly employed, engaged in business, professional or other activities in the state of _____ I am not currently suspended or disbarred in any court.

6. I have concurrently or within the past 36 months made pro hac vice applications to this court in the following actions:

Court	Case Number	Title of Action	Date of Application	Disposition of Application

7. I ☐ have ☐ have not been disciplined by any court or administrative body ☐ disciplinary proceedings are pending; details are as follows:

I ☐ resigned ☐ did not resign while disciplinary proceedings were pending.

8. I certify that I have read the LBRs, the FRBP, the F.R.Civ.P., and the F.R.Evid., in their entirety.

9. I designate the following person of the following law firm, who is a member of the bar of this court and maintains an office in this district for the practice of law, as the attorney with whom the court and opposing counsel may readily communicate regarding the conduct of this case, and upon whom papers may be served:

Name of attorney (Designee):

Roy Terry, Esquire

Name and address of law firm, or residence address:

Roy Terry, Esquire

Telephone number of law firm: (804) 370-2866

10. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Date: _____

Signature of applicant

Printed name of applicant

CONSENT OF DESIGNEE

I consent to the foregoing designation.

Date: 9/24/20

Eloise K. Hahn
Signature of Designee

Eloise K. Hahn
Printed name of Designee

*The subject designations are contingent
on retainer agreements in bankruptcy
court. I have not received any
agreement to date, therefore, all
responses to the complaint should
be directed to my attn.*

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

A true and correct copy of the foregoing document entitled: **APPLICATION OF NON-RESIDENT ATTORNEY TO APPEAR IN A SPECIFIC CASE [LBR 2090-1(b)]** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**: Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) _____, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☐ Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL**:

On (date) 9/24/20, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

see attached

☐ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

9/24/20
Date

Eloise Hahn
Printed Name

Eloise K. Hahn
Signature

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.



CHESTERTON
1070 S CALUMET RD
CHESTERTON, IN 46304-9998
(800)275-8777

09/23/2020 03:36 PM

Product	Qty	Unit Price	Price
PM Express 1-Day	1		\$26.35
Flat Rate Env			
Richmond, VA 23219			
Flat Rate			
Signature Waiver			
Scheduled Delivery Date			
Thursday 09/24/2020 12:00 PM			
Money Back Guarantee			
Tracking #:			
EJ450083834US			
Insurance			\$0.00
Up to \$100.00 included			
Total			\$26.35
US Flag Bklt/20	1	\$11.00	\$11.00
Total			\$11.00

Grand Total: \$37.35

Debit Card Remitted \$37.35
Card Name:MasterCard
Account #:XXXXXXXXXX4422
Approval #
Transaction #:543
Receipt #:025020
Debit Card Purchase:\$37.35
Cash Back:\$0.00
AID:A0000000042203 Chip
AL:Debit
PIN:Verified Debit

Due to limited transportation
availability as a result of
nationwide COVID-19 impacts
package delivery times may be
extended. Priority Mail Express®
service will not change.

In a hurry? Self-service kiosks offer
quick and easy check-out. Any Retail
Associate can show you how.

Save this receipt as evidence of
insurance. For information on filing
an insurance claim go to
<https://www.usps.com/help/claims.htm>

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(2USPS) to get the latest status.
Standard Message and Data rates may
apply. You may also visit www.usps.com
USPS Tracking or call 1-800-222-1811.

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CHESTERTON
1070 S CALUMET RD
CHESTERTON, IN 46304-9998
(800)275-8777

09/23/2020 03:16 PM

Product	Qty	Unit Price	Price
MadeofHearts	2	\$0.55	\$1.10
Total			\$1.10

First-Class Mail®	1		\$1.40
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Large Envelope
Chicago, IL 60601
Weight:0 Lb 3.00 Oz
Estimated Delivery Date
Saturday 09/26/2020

Total			\$1.40
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Money Order			\$350.00
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Serial#:26615257918

Money Order Fee			\$1.25
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Total			\$351.25
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Grand Total:			\$353.75
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Cash			\$350.00
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Debit Card Remitted			\$3.75
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Card Name:MasterCard

Account #:XXXXXXXXXX4422

Approval #

Transaction #:539

Receipt #:025016

Debit Card Purchase:\$3.75

Cash Back:\$0.00

AID:A0000000042203 Chip

AL:Debit

PIN:Verified Debit

Due to limited transportation
availability as a result of
nationwide COVID-19 impacts
package delivery times may be
extended. Priority Mail Express®
service will not change.

In a hurry? Self-service kiosks offer
quick and easy check-out. Any Retail
Associate can show you how.

Preview your Mail
Track your Packages
Sign up for FREE ®
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Refunds for guaranteed services only.
Thank you for your business.

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840-5460-0131-001-00045-19865-01

or scan this code with your mobile
device,



UNITED STATES POSTAL SERVICE		CUSTOMER'S RECEIPT	
SEE BACK OF THIS RECEIPT FOR IMPORTANT CLAIM INFORMATION NOT NEGOTIABLE	Pay to	KEEP THIS RECEIPT FOR YOUR RECORDS	
	Address	United States Bankruptcy Court 701 E. General St., Ste 4000 Richmond VA 23219	
	Serial Number	Year, Month, Day	Post Office
26615257918	2020-09-23	463040	\$350.00
			Clerk 18

I, Eloise Kathleen Hahn, do hereby certify that I prepared my adversary criminal through direction of counsel. I am requesting representation for the conference call scheduled 11/10/20 at 9:30 a.m. eastern time Judge Phillips Courtroom, Room 5100, Richmond, VA 23219. All responses from defendants should be directed to my attention at my personal residential address as documented on page 1.

I, Eloise Kathleen Hahn, do hereby certify that I mailed a copy of this document to the following parties, including a copy of my USPS money order receipt, no 26615257918, federally expressed to the bankruptcy court on September 23, 2020 with noontime arrival time on September 24, 2020, being:

United States Bankruptcy Court
Attn: William Redden, Clerk of the Court
701 E. Broad St.
Room 4000
Richmond, VA 23219

Judge Keith L. Phillips - Courtroom
United States Bankruptcy Court
701 E. Broad St.
Room 5100
Richmond, VA 23219

Rudolph C. McCollum, Jr.
McCollum @ Law PC
PO Box 4595
Richmond, VA 23220

Kutak Rock LLP
Attn: Peter Barrett, Esq.
901 E. Byrd St.
Suite 1000
Richmond, VA 23219-4071

McGuire & Woods
Gateway Plaza

800 E. Canal St.
Richmond, VA 23219

United States Dept. of Justice
Attn: Michael Haungs, Esquire
Attn: John Schumann, Esquire
Tax Division, Appellate Section
P.O. Box 502
Washington, D.C. 20044

Steve Leahey, Esquire, pending retainer agreement nothing final
150 N. Michigan Av
Suite 1120
Chicago, IL 60601

Roy Terry, Esquire, pending retainer agreement nothing final
The Terry Law Firm
2711 Buford Rd.
Ste 170
North Chesterfield, VA 23235

September 24, 2020

Eloise Kathleen Huh
Eloise Kathleen Huh

United States Bankruptcy Court
Eastern District of Virginia
Richmond Division

In re:
Thomas Alan Minor and Renee Scott Minor

Case Number 10-30161-KLP
Chapter 7
Adversary Proceeding Number 20-03129-KLP
Judge Keith L. Phillips

Debtor(s)
Eloise K Hahn

related to bankruptcy

Plaintiff(s)

requesting assistance

V.

Thomas Alan Minor et al.

Defendant(s)

To: Eloise K Hahn

NOTICE OF DEFICIENT FILING

Upon authority of Local Bankruptcy Rule 5005-1, the documents submitted by you

I - Adversary case 20-03129. Complaint against Thomas Alan Minor, U. S. Trust Bank of America Private Wealth Management, Commissioner of the IRS filed by Eloise K Hahn. (Attachments: # 1 Amended Proof of Claim 1-2 # 2 Amended Proof of Claim 1-3) Nature of Suit: (62 (Dischargeability - 523(a)(2), false pretenses, false representation, actual fraud)) Associated Bankruptcy Case Number: 3:10-bk-30161 (Smith, Linda)

contain certain deficiencies as set forth below. You must correct the deficiencies on or before 9/29/20. Failure to timely correct the deficiencies may result in the pleading or other paper *being stricken from the record or, if a complaint is deficient, the adversary proceeding being dismissed.*

REPRESENTATION AND APPEARANCES:

- the ECF registered participant attorney filing the document does not match the attorney's signature on the document.
- **Requirement of Counsel:** filed on behalf of an entity not a natural person acting on own behalf and not signed by counsel permitted to appear under LBR 2090-1. [See LBR 9010-1]
- **Identification of Attorney:** State Bar number omitted from document/proposed order. [See LBR 5005-1(C)(5) and 9022-1(A)]
- a written application for *pro hac vice* admission must be appended to the motion filed by a member of the Bar of this Court. [See LBR 2090-1(E)(2)(a)]

REQUIREMENT OF FORM:

- **Legibility:** not in compliance with LBR 5005-1(C)(1)
- **Caption, Official Forms:** [See LBR 5005-1(C)(2)] Every paper must bear the debtor(s) name, the case number and chapter of the case to which it pertains and be in substantial compliance with the current Official Form. *If applicable, Case name and/or number do not match on paper submitted.*
- Not on acceptable form approved by Court for use in Eastern District of Virginia pursuant to Local Bankruptcy Rule 3015-2(A).
- **Signature Required:** not signed by counsel of record, or individual, if *pro se*.
 - *if corporation*, not signed by counsel. [See LBR 5005-1(C)(4)]
 - *if amendment to petition, lists or *schedules*, not verified by unsworn declaration with original signature of all debtors and, if required, the original signature of the attorney. [See FRBP 1008]
 - *if document submitted in electronically filed case*, signature not indicated with the party's name and/or attorney's name typed in full on the signature line, e.g. /s/ Jane Doe. [See CM/ECF Policy Statement 8.B., Form of Signature of Attorney User and Non-Attorney User.]
- Document does not appear to be complete. Please review this filing for possible error and relate any amendment/correction to the original document.
- Document does not match the event entry used for docketing. Please review this filing and redocket using the correct event entry or redocket to attach the correct document.
- Document appears to be filed in the wrong case. Please review this filing and docket to the correct case.
- **XX** Document does not include a certification whether an Attorney assisted with the preparation of the document. [See LBR 2090-1]
- *Amended schedules do not include Form 106Dec - Declaration About an Individual Debtor's Schedules, or Form 106Dec is not signed.

Date: September 15, 2020

Clerk, United States Bankruptcy Court

By /s/ Suzan Ramirez-Lowe, Deputy Clerk
Direct Dial Telephone No. 804-916-2421

[defntcvNov2019.jsp]

United States Bankruptcy Court
Eastern District of Virginia
Richmond Division

Case Number 10-30161-KLP
Chapter 7
Adversary Proceeding Number 20-03129-KLP
Judge Keith L. Phillips

In re:
Thomas Alan Minor and Renee Scott Minor

Debtor(s)

Eloise K Hahn

Plaintiff(s)

V.

Thomas Alan Minor et al.

Defendant(s)

SUMMONS AND NOTICE IN AN ADVERSARY PROCEEDING

YOU ARE SUMMONED and required to submit a motion or answer to the complaint which is attached to this summons to the Clerk of the Bankruptcy Court within 30 days after the date of issuance of this summons, except that the United States and its offices and agencies shall file a motion or answer to the complaint within 35 days. **Motion or Answer is due by 10/15/2020; (IRS - 10/20/20).** If you make a motion, your time to answer is governed by Fed.R.Bankr.P. 7012.

ADDRESS OF CLERK:	William C. Redden United States Bankruptcy Court 701 East Broad Street Richmond, VA 23219
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At the same time, you must also serve a copy of the motion or answer upon the plaintiff's attorney.

NAME AND ADDRESS OF PLAINTIFF'S ATTORNEY:	Eloise K Hahn 313 E. 1300 N. Chesterton, IN 46304
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YOU ARE NOTIFIED that a pretrial conference of the proceeding commenced by the filing of the complaint will be held at the following time and place:

ADDRESS:	Judge Phillips' - Courtroom, U. S. Bankruptcy Court, 701 E. Broad St., Rm. 5100, Richmond, VA 23219
DATE AND TIME:	11/10/20 at 09:30 AM

IF YOU FAIL TO RESPOND TO THIS SUMMONS, YOUR FAILURE WILL BE DEEMED TO BE YOUR CONSENT TO ENTRY OF A JUDGMENT BY THE BANKRUPTCY COURT AND JUDGMENT BY DEFAULT MAY BE TAKEN AGAINST YOU FOR THE RELIEF DEMANDED IN THE COMPLAINT.

Date: September 15, 2020

WILLIAM C. REDDEN, CLERK OF COURT
By /s/ Suzan Ramirez-Lowe
Deputy Clerk



[Note: It is the responsibility of counsel for the plaintiff/movant to advise the Court of any settlement or any other valid reason that a Court scheduled pretrial conference, hearing or trial need not be conducted. Counsel are advised to provide the Court with such notification as far in advance of any such conference, hearing or trial as is practical under the circumstances. Failure of such counsel to properly and timely notify the Court may result in the imposition of sanctions. Local Bankruptcy Rule 9013-1(O)].

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20-3129